

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

**BRYAN QUIROS IRIZARRY**  
**SSN xxx-xx-3052**

**CASE NO. : 19-02714 EAG**

**DEBTOR**

Chapter 13

**REPLY TO TRUSTEE'S REPORT ON CONFIRMATION**

**TO THE HONORABLE COURT:**

COME NOW, debtors, Bryan Quiros Irizarry , through the undersigned attorney and respectfully avers and prays:

1. That the trustee filed an unfavourable report on confirmation in the present case stating. "Debtor has failed to file 2016 tax return." Alleging the debtor purchased a vehicle in March 2014 in Tennessee and that he may need to file 1049 P.R.
2. The debtor was not employed in 2016 and therefore need not file 1040 PR or state tax returns for year 2016.
3. The debtor has made an unsworn statement pursuant to 28 U.S. Code §1746, in which he explains how he acquired the car, (in which he had no credit or job) that his father was going to make the car payments and the reason for the deficiency. See Exhibit I

**WHEREFORE**, the debtor prays that the Court take notice and that the case may be confirmed since it meets the requirements of § 1322 and 1325.

**Certificate of Service:** I hereby certify that on this date I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the US Trustee, to all CM/ECF participants, and to

all creditors as per the matrix mailing list.

*In Yauco, Puerto Rico, this 1 day of October, 2019.*

/s/ Nydia González Ortiz  
NYDIA GONZALEZ ORTIZ, ESQ  
USDC-PR 124006  
Attorney for debtor  
SANTIAGO & GONZALEZ LAW, LLC  
11 Betances Street  
Yauco, Puerto Rico 00698  
Tels: (787) 267-2205/267-2252

### UNSWORN STATEMENT

I, Bryan Quiros Irizarry, of legal age, single, employed, and resident of Yauco, Puerto Rico declare under oath as follows:

1. That the circumstances stated above are true.
2. That in the year 2016, I was residing with my father in the State of Tennessee.
3. That I needed a car to travel and on April 1, 2016, I went to the dealer "Buy Here Pay Here", which offered financing through the dealer.
4. I did not have credit but, I was informed by the dealer that was not a problem.
5. That my father was going to make the car payments meantime.
6. That I purchase a 2003 Infinity which turn out to be a real lemon and a week later took it back to the dealer for repair.
7. That the car was never repaired and we did not make payments on the car, and after dispute with the dealer I did not continue and finally the car was sold months later for \$ 1,400.00 declaring a deficiency.
8. That in the year 2016 I did not file income tax return since, I was a student and did not work in the United States or Puerto Rico.
9. That I sign this document under 28 U.S. Code § 1746.Unsworn declarations under penalty of perjury.

In Yauco, Puerto Rico this 1 day of October of 2019



Bryan Quiros Irizarry